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8 *Attorneys for Defendant*
9 *Employment Services, Inc., d/b/a Aviation Institute*
10 *of Maintenance*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 NICOLE LEASE, an individual;

14 Case No. 2:17-cv-02835-RFB-NJK

15 Plaintiff,

16 v.

17 EMPLOYMENT SERVICES, INC., d/b/a
18 AVIATION INSTITUTE OF
19 MAINTENANCE;

20 **Defendant**

21 **STIPULATION AND ORDER TO**
22 **ARBITRATE AND STAY PROCEEDINGS**

23 This stipulation is entered into by the Parties, Nicole Lease (“Plaintiff”) and Employment
24 Services, Inc., d/b/a Aviation Institute of Maintenance (“Defendant”), by and through their counsel,
25 with reference to the following:

26 WHEREAS, during the course of her study with Defendant, Plaintiff allegedly entered into
27 an agreement with Defendant to arbitrate disputes arising out of or relating to Plaintiff’s enrollment
28 and study with Defendant, hereinafter referred to as the “Arbitration Agreement”;

29 WHEREAS, on August 22, 2017, Plaintiff filed a Complaint in the Eighth judicial District
30 Court, Clark County, Nevada, which Defendant removed to this Court pursuant 28 U.S.C. § 1331,
31 styled as *Nicole Lease v. The Aviation Institute of Maintenance*, Case No. 2:17-cv-02835-RFB-

1 NJK, alleging various claims of violation of Nevada and possibly federal law.

2 WHEREAS, the claims alleged in the Action fall within the scope of the Arbitration
3 Agreement;

4 IT IS HEREBY STIPULATED by and between the Parties as follows:

5 1. This Action, in its entirety, shall be submitted to binding arbitration with JAMS
6 before retired judge Philip Pro or Lawrence Leavitt, pursuant to a Stipulated Arbitration Agreement
7 executed by the Parties;

8 2. All proceedings in this Action shall be stayed and this Court shall retain jurisdiction
9 over this Action pending the conclusion of the arbitration.

10 Dated: December 8th, 2017.

11 LAW OFFICES OF NEAL HYMAN

12 JACKSON LEWIS P.C.

13 /s/ Neal K. Hyman

14 Neal K. Hyman, Bar #05998
9480 S. Eastern Avenue, Ste #260
15 Las Vegas Nevada, 89123
16 Attorney for Plaintiff Nicole Lease

17 /s/ Lisa A. McClane

18 Lisa A. McClane, Bar #10139
Thomas M. Lucas, VA Bar #27274 (pro hac
motion pending)
3800 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
19 Attorneys for Defendant
Aviation Institute of Maintenance

20 IT IS SO ORDERED.



21 RICHARD F. BOULWARE, II
22 United States District Judge

23 DATED this 14th day of December, 2017.